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8

9 IN THE UNITED STATES DISTRICT COURT  
10 EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,  
12 Plaintiff,  
13 v.  
14 HEATHER ROMOSER,  
15 Defendant

CASE NO. 2:21-CR-00110-DAD-5

**STIPULATION TO VACATE  
SENTENCING AND SET MATTER  
FOR A STATUS CONFERENCE  
REGARDING SETTING  
SENTENCING HEARING; ORDER**

16  
17 Defendant HEATHER ROMOSER, by and through his counsel of record, TONI WHITE,  
18 and the GOVERNMENT, by and through Assistant United States Attorney ANGELA SCOTT,  
19 hereby stipulate as follows:

- 20 1. By previous order, this matter was set for sentencing on June 11, 2024.
- 21 2. By this stipulation, defendant now moves to vacate the sentencing hearing and set a  
22 status regarding sentencing for July 16, 2024. The GOVERNMENT does not oppose this request.
- 23 3. Defense counsel is working on putting together a mitigation package for Ms.  
24 Romoser and needs additional time to complete that task so that mitigation information can be  
25 transmitted to the probation officer prior to the preparation of the presentence report. Setting a status  
26 at this time will give defense counsel the opportunity to determine a timeline and to request a  
27 disclosure schedule going forward that will be more realistic.
- 28 4. The probation officer, Janice Slusarenko, is in agreement with this request.

1 IT IS SO STIPULATED.

2 Dated: May 22, 2024

PHILLIP A. TALBERT

United States Attorney

By: /s/ Toni White for

ANGELA SCOTT

Assistant U.S. Attorney

For the United States

7 Dated: May 22, 2024

By: /s/ Toni White

TONI WHITE

For Defendant Heather Romoser

13 **ORDER**

14 Pursuant to the stipulation of the parties and good cause appearing, the sentencing hearing  
15 scheduled in this action for June 11, 2024, is vacated and a hearing regarding the status of sentencing  
16 is now set for July 16, 2024, at 9:30 a.m.

17 IT IS SO ORDERED.

18 Dated: May 22, 2024

Dale A. Drozd  
DALE A. DROZD  
UNITED STATES DISTRICT JUDGE